

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

| | | |
|--------------------------------------|---|----------------------------|
| SUNGARD RECOVERY SERVICES, LP | : | |
| 1285 Drummers Lane | : | |
| Wayne, PA 19087-1572, | : | |
| Plaintiff | | CIVIL ACTION – LAW |
| v. | : | No. _____ |
| HUDSON UNITED BANK | : | |
| 1000 MacArthur Boulevard | : | JURY TRIAL DEMANDED |
| Mahwah, NJ 07430-2099, | : | |
| Defendant | | |

NOTICE OF REMOVAL

Defendant Hudson United Bank, pursuant to 28 U.S.C. §§ 1332 and 1446, hereby removes this action from the Court of Common Pleas of Chester County, Pennsylvania to this Court. In support of said removal, Defendant states:

1. This action was initiated by Plaintiff SunGard Recovery Services, LP, a Pennsylvania limited partnership with its principal place of business located at 1285 Drummers Lane, Wayne, Chester County, Pennsylvania.
2. In the complaint, Plaintiff has demanded judgment in excess of \$100,000.00 for breach of contract. A true and correct copy of the Complaint is attached hereto as Exhibit "A."
3. The amount in controversy in this case exceeds \$75,000.00.
4. Defendant is a New Jersey banking institution with its principal place of business located at 1000 MacArthur Boulevard, Mahwah, Bergen County, New Jersey.
5. Defendant is not a citizen of the Commonwealth of Pennsylvania.

6. Defendant is a citizen of a different state from Plaintiff and, therefore, complete diversity exists between the parties hereto.

8. This Court has original jurisdiction over this action pursuant to 28 U.S.C. § 1332(a)(1), because the matter in controversy exceeds the sum of \$75,000.00, and the Defendant is a citizen of a different state than Plaintiff.

FLAMM, BOROFF & BACINE, PC

DATE: _____

By: _____

**STEVEN KAPUSTIN
ROBERT R. WATSON, JR.
Pa. Atty. ID Nos. 17981/83787
Union Meeting Corporate Center
925 Harvest Drive, Suite 220
Blue Bell, PA 19422
(215) 239-6000
(215) 239-6060 (fax)**
Attorneys for Defendant

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

SUNGARD RECOVERY SERVICES, LP, :
Plaintiff : CIVIL ACTION – LAW
v. :
No. _____
HUDSON UNITED BANK, :
Defendant :
:

NOTICE OF FILING OF REMOVAL NOTICE

To: Calvin J. McNulty, Esquire
Bazil & Associates, PC
102 Pickering Way, Suite 402
Exton, PA 19341-1330

YOU ARE HEREBY NOTIFIED that on July 19, 2002, Defendant Hudson United Bank filed with the Clerk of the United States District Court for the Eastern District of Pennsylvania, a Notice of Removal, pursuant to 28 U.S.C. §§ 1332 & 1446.

FLAMM, BOROFF & BACINE, PC

DATE:_____

By:_____

STEVEN KAPUSTIN
ROBERT R. WATSON, JR.
Pa. Atty. ID Nos. 17981/83787
Union Meeting Corporate Center
925 Harvest Drive, Suite 220
Blue Bell, PA 19422
(215) 239-6000
(215) 239-6060 (fax)
Attorneys for Defendant

FLAMM, BOROFF & BACINE, PC
By: Steven Kapustin
Atty. ID No. 17982
By: Robert R. Watson, Jr.
Atty. ID No. 83787
Union Meeting Corporate Center
925 Harvest Drive, Suite 220
Blue Bell, PA 19422
(215) 239-6000

Attorneys for Defendant

| | | |
|---------------------------------------|---|------------------------------|
| SUNGARD RECOVERY SERVICES, LP, | : | COURT OF COMMON PLEAS |
| Plaintiff | | CHESTER COUNTY, PA |
| | : | |
| v. | : | CIVIL ACTION – LAW |
| | : | |
| HUDSON UNITED BANK, | : | No. 02-04932 |
| Defendant | | |

NOTICE OF FILING OF REMOVAL NOTICE

TO THE PROTHONOTARY:

YOU ARE HEREBY NOTIFIED that on July 19, 2002, Defendant Hudson United Bank, filed with the Clerk of the United States District Court for the Eastern District of Pennsylvania, a Notice of Removal, pursuant to 28 U.S.C. §§ 1332 & 1446.

FLAMM, BOROFF & BACINE, PC

DATE:_____

By:_____
STEVEN KAPUSTIN
ROBERT R. WATSON, JR.
Attorneys for Defendant